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Attorneys for Defendants
RANDSTAD NORTH AMERICA, INC.,
RANDSTAD INHOUSE SERVICES, L.P. (incorrectly
sued as "RANDSTAD STAFFING, U.S., L.P."), and
CARL ZEISS MEDITEC, INC. (incorrectly sued as
"CARL ZEISS MEDITEC GROUP")

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ERNEST J. HERNANDE,

Plaintiff,

v.

RANDSTAD STAFFING, U.S., L.P., a
Delaware Corporation; RANDSTAD NORTH
AMERICA, INC., a Delaware Corporation;
CARL ZEISS MEDITEC GROUP, a New
York Corporation; and DOES 1 through 25,
inclusive,

Defendants.

Case No. 3:16-cv-00866 WHA

**JOINT STIPULATION TO CONTINUE
MEDIATION DEADLINE TO
SEPTEMBER 27, 2016**

Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, Plaintiff Ernest J. Hernande
("Plaintiff") and Defendants Randstad North America, Inc., Randstad Inhouse Services, L.P.
(incorrectly sued as "Randstad Staffing, U.S., L.P.") (collectively "Randstad"), and Carl Zeiss

1 Meditec, Inc. (incorrectly sued as “Carl Zeiss Meditec Group”) (“Carl Zeiss”) (collectively
2 “Defendants”) hereby stipulate as follows:

3 WHEREAS, in the Court’s Case Management Order and Reference to ADR Unit for
4 Mediation, the Court ordered the parties to mediation within 90 days of June 1, 2016, or by
5 August 30, 2016;

6 WHEREAS, in the Court’s Notice of Appointment of Mediator filed on June 8, 2016, the
7 Court notified the parties that Christine Noma is assigned as the mediator;

8 WHEREAS, the parties have worked diligently to agree to mediation before Christine
9 Noma and set a mediation date. The parties have agreed, subject to the Court approving the
10 extension of the mediation deadline, to mediate with Christine Noma in Oakland, California on
11 September 27, 2016. The parties have set and Ms. Noma has approved September 27, 2016 as the
12 mediation date. September 27, 2016 is the earliest date all the parties and Ms. Noma are available
13 for mediation based on scheduling issues. Continuing the mediation deadline to September 27,
14 2016 will also allow the parties sufficient time to conduct discovery to make for a productive
15 mediation session.

16 NOW THEREFORE, THE PARTIES AGREE AND STIPULATE that the mediation
17 deadline be continued to September 27, 2016 subject to approval by the Court.

18 Pursuant to Local Rule 6-2, there have been no other time modifications in this case, and
19 it is not anticipated that this extension will affect the schedule for the case. Moreover, pursuant to
20 Local Rule 6-2, the Declaration of Nabeel Ahmad is attached as Exhibit A to the Stipulation.

21 **IT IS SO STIPULATED.**
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1 DATED: July 7, 2016

Respectfully submitted,

2 MCCORMACK AND ERLICH LLP

3
4 By: /s/ Paul K. Pfeilschifter

5 Bryan J. McCormack
Paul K. Pfeilschifter

6 Attorneys for Plaintiff
ERNEST J. HERNANDE

7
8 DATED: July 7, 2016

Respectfully submitted,

9 SEYFARTH SHAW LLP

10
11 By: /s/ Nabeel Ahmad

12 Andrew M. McNaught
Nabeel Ahmad

13 Attorneys for Defendants
14 RANDSTAD NORTH AMERICA, INC.,
15 RANDSTAD INHOUSE SERVICES, L.P.
16 (incorrectly sued as "RANDSTAD
17 STAFFING, U.S., L.P."), and CARL ZEISS
18 MEDITEC, INC. (incorrectly sued as "CARL
19 ZEISS MEDITEC GROUP")

20 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

21 Dated: July 12, 2016.

By: 

22 Hon. William H. Alsup
23 JUDGE OF THE UNITED STATES DISTRICT
24 COURT

25 **ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)**

26 I, Nabeel Ahmad, attest that concurrence in the filing of this stipulation has been obtained
27 from the signatory, Paul K. Pfeilschifter, counsel for Plaintiff.

28 DATED: July 7, 2016

By: /s/ Nabeel Ahmad

Nabeel Ahmad